

NETLIST, INC.,

Plaintiff,

VS.

MICRON TECHNOLOGY, INC.; MICRON)
SEMICONDUCTOR PRODUCTS, INC.;)
MICRON TECHNOLOGY TEXAS LLC,)

Defendants.

Case No. 2:22-cv-203-JRG

JURY TRIAL DEMANDED

**DECLARATION OF MICHAEL R. RUECKHEIM IN SUPPORT OF DEFENDANTS’
MOTION TO STRIKE EXPERT REPORT OF DR. WILLIAM HENRY MANGIONE-
SMITH**

I am an attorney at the law firm of Winston & Strawn LLP, counsel of record for Defendants Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Technology Texas LLC (collectively, “Micron”) in the above captioned matter. I am a member in good standing of the State Bar of Texas. I provide this declaration in support of Micron’s Motion to Strike Expert Report of Dr. William Henry Mangione-Smith.

1. A true and correct copy of Dr. William Henry Mangione-Smith’s Opening Expert Report served on October 4, 2023 is attached as Exhibit 1.

2. A true and correct copy of the transcript of the Motion Hearing before Magistrate Judge Payne held on October 23, 2023 in this case is attached at Exhibit 2.

3. A true and correct copy of a table of any mention of the ’506 and ’339 patents or the “distributed data buffer” technology in Dr. William Henry Mangione-Smith’s Opening Expert Report is attached at Exhibit 3.

4. A true and correct copy of the Court’s Order on Pretrial Motions and Motions in Limine from the case *Netlist, Inc. v. Samsung Elecs. Co., Ltd.*, 21-cv-00463-JRG (E.D. Tex.) (ECF No. 432) is attached as Exhibit 4.

5. A true and correct copy of excerpts from the deposition transcript of Mr. Chuck Hong is attached as Exhibit 5.

6. A true and correct copy of excerpts of the Final Written Decision in the IPR proceeding (IPR2022-00418) regarding U.S. Patent No. 8,301,833 is attached as Exhibit 6.

7. A true and correct copy of Netlist’s infringement chart for U.S. Patent No. 11,016,918 served on September 8, 2022 is attached as Exhibit 7.

8. A true and correct copy of Netlist’s infringement chart for U.S. Patent No. 11,232,054 served on September 8, 2022 is attached as Exhibit 8.

9. A true and correct copy of excerpts of JEDEC standard JESD301-1A is attached as Exhibit 9.

10. A true and correct copy of excerpts from the deposition transcript of Mr. Bruce Lo is attached as Exhibit 10.

11. A true and correct copy of Netlist's 4-1 Disclosures is attached as Exhibit 11.

12. A true and correct copy of Netlist's 4-2 Disclosures is attached as Exhibit 12.

* * *

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on November 14, 2023, in Redwood City, California.

By: /s/ Michael R. Rueckheim
Michael R. Rueckheim